

## FILED IN DISTRICT COURT OKLAHOMA COUNTY THE DISTRICT COURT OF OKLAHOMA COUNTY

## STATE OF OKLAHOMA

NOV 16 2022

Oklahoma Department of Securities <i>ex rel</i> . Melanie Hall, Administrator	RICK WARREN COURT CLERK
ex ret. Welanic Han, Administrator	109
Plaintiff,	)
V.	) Case No.: CJ-2022-5066 ) The Honorable Don Andrews
Premier Global Corporation, a Kansas corporation, formerly known as Premier Construction Services, Inc., and doing business as Premier Construction Billing; Premier Factoring, LLC, a Kansas limited liability company; PF-2 LLC, a Kansas limited liability company; PF-3, LLC, a Kansas limited liability company; PF-4, LLC, a Kansas limited liability company; PF-5, LLC, a Kansas limited liability company; PF-6, LLC, a Kansas limited liability company; PF-7, LLC, a Kansas limited liability company; DDI Advisory Group, LLC, a Kansas limited liability company; Steve Jonathan Parish, an individual; Richard Dale Dean, an individual; Premier Marketing Management, a Kansas corporation; Joshua Dane Owen, an individual; J&H Holdings, LLC, a cancelled Oklahoma limited liability company; Kyle Blackburn, an individual; Mitzimack, Inc., an Oklahoma corporation; Erika Greggs, an individual; Elkins & Associates Inc., an Oklahoma corporation; Clyde Edward Elkins, an individual; James Scott Stanley, an individual;	The Honorable Don Andrews
Edmond Brokerage, Inc. an Oklahoma corporation;	)
Brent Lee Worley, an individual;	)
Byron Kent Freeman, an individual;	)
Karen Lynne Freeman, an individual; and	)
Jay Michael Bogdahn, an individual,	)
D. C 1	)
Defendants.	)

## DEFENDANT JAY MICHAEL BOGDAHN'S JOINDER TO MOTION TO DISMISS PLAINTIFF'S PETITION AND BRIEF IN SUPPORT OF DEFENDANTS J&H HOLDINGS, LLC, KYLE BLACKBURN, MITZIMACK, INC., ERIKA GREGGS, JAMES SCOTT STANLEY, EDMOND BROKERAGE, INC., BRENT LEE WORLEY, BYRON KENT FREEMAN, AND KAREN LYNNE FREEMAN

COMES NOW Defendant Jay Michael Bogdahn ("Bogdahn"), by and through counsel, and submits this Joinder to *Motion to Dismiss Plaintiff's Petition and Brief in Support of Defendants J&H Holdings, LLC, Kyle Blackburn, Mitzimack, Inc., Erika Greggs, James Scott Stanley, Edmond Brokerage, Inc., Brent Lee Worley, Byron Kent Freeman, And Karen Lynne Freeman filed on November 10, 2022* (the "Motion to Dismiss"). Bogdahn adopts and incorporates by reference all sections of the Motion to Dismiss.

Accordingly, for the reasons set forth in the Motion to Dismiss referenced herein, Bogdahn respectfully requests an order dismissing Plaintiff's Petition, and granting all other and further relief as the Court deems just and appropriate.

Respectfully Submitted,

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## **CERTIFICATE OF MAILING**

This shall certify that on this <u>lbth</u> day of November, 2022, a true and correct copy of the above and the foregoing was mailed, via U.S. Mail, postage prepaid, to the following:

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